

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Cordova, Alabama))

MM Docket. No. 94-41
RM-8443

RECEIVED

To: Acting Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

JUL 22 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COUNTERPROPOSAL

Goodling Broadcasting Company, ("GBC"), by its counsel, hereby files its counterproposal to the Notice of Proposed Rule Making, 9 FCC Rcd 2490 (1994), which proposed to substitute Channel 237A for Channel 223A at Cordova, Alabama and to modify the license for Station WFFN(FM) to specify Channel 237A. Rather than delete Channel 223A, GBC proposes to allot Channel 223A to Dora, Alabama, as its first local service. In support hereof, GBC states as follows:

1. Dora (pp. 2,214) is located in Walker County (pop. 67,670). Dora is listed in the 1990 U.S. Census as an incorporated city. Dora has a mayor/city council form of government, its own water supply, police and fire protection units, schools, churches and businesses. Thus Dora qualifies as a community under Section 307(b) of the Communications Act of 1934, as amended.

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2. As indicated in the attached channel study, Channel 223A can be allotted to Dora at the same coordinates that currently exist for this channel at Cordova: 33° 40' 38" NL and 87° 11' 33" WL or, in the alternative, the site can be moved east at coordinates: 33° 40' 15" NL and 87° 06' 45" WL.

3. GBC has suggested an alternative site area further east to provide some relief to Station WJBB-FM, Haleyville, Alabama on Channel 224A. Although Channel 223A is fully spaced to Haleyville, the licensee of Station WJBB-FM has complained about adjacent channel interference. The proposed alternative set of coordinates moves the reference site approximately 6 km further away from Haleyville. A site area mapping study is also provided to demonstrate a sizable area available to locate Channel 223A consistent with the minimum spacing requirements.

4. Accordingly, Goodling Broadcasting Company hereby states that should Channel 223A be allotted to Dora, it will submit an application to provide a first local service and, if authorized, construct the station.^{1/} The allotment of Channel 223A to Dora enables Station WFFN to remain on Channel 237A as requested and provides additional protection to the existing service area of Station WJBB-FM, Haleyville. The Commission

^{1/} The Notice proposed to reallocate Channel 237A to Cordova for use by Station WFFN(FM). This channel appears to be available for allotment to Cordova only at WFFN's site due to the constraints imposed by Holly Pond, Alabama Channel 238A and by Station WFFX(FM), Tuscaloosa, Alabama, Channel 239C1. If Channel 237A were made available for application instead as a result of this proceeding, GBC would also be interested in applying for that channel.

should allot Channel 223A to Dora as its first local service if
deleted as proposed from Cordova.

Respectfully submitted,

GOODLING BROADCASTING COMPANY

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July 22, 1994

PAUL REYNOLDS
480 GREENVILLE BYPASS - GREENVILLE AL 36037

LOCATION WINDOW - CH 223A
MOVEMENT TO EAST POSSIBLE

REFERENCE

33 40 38 N

87 11 33 W

CLASS A

Current rules spacings

CHANNEL 223 - 92.5 MHz

DISPLAY DATES

DATA 06-27-94

SEARCH 07-20-19

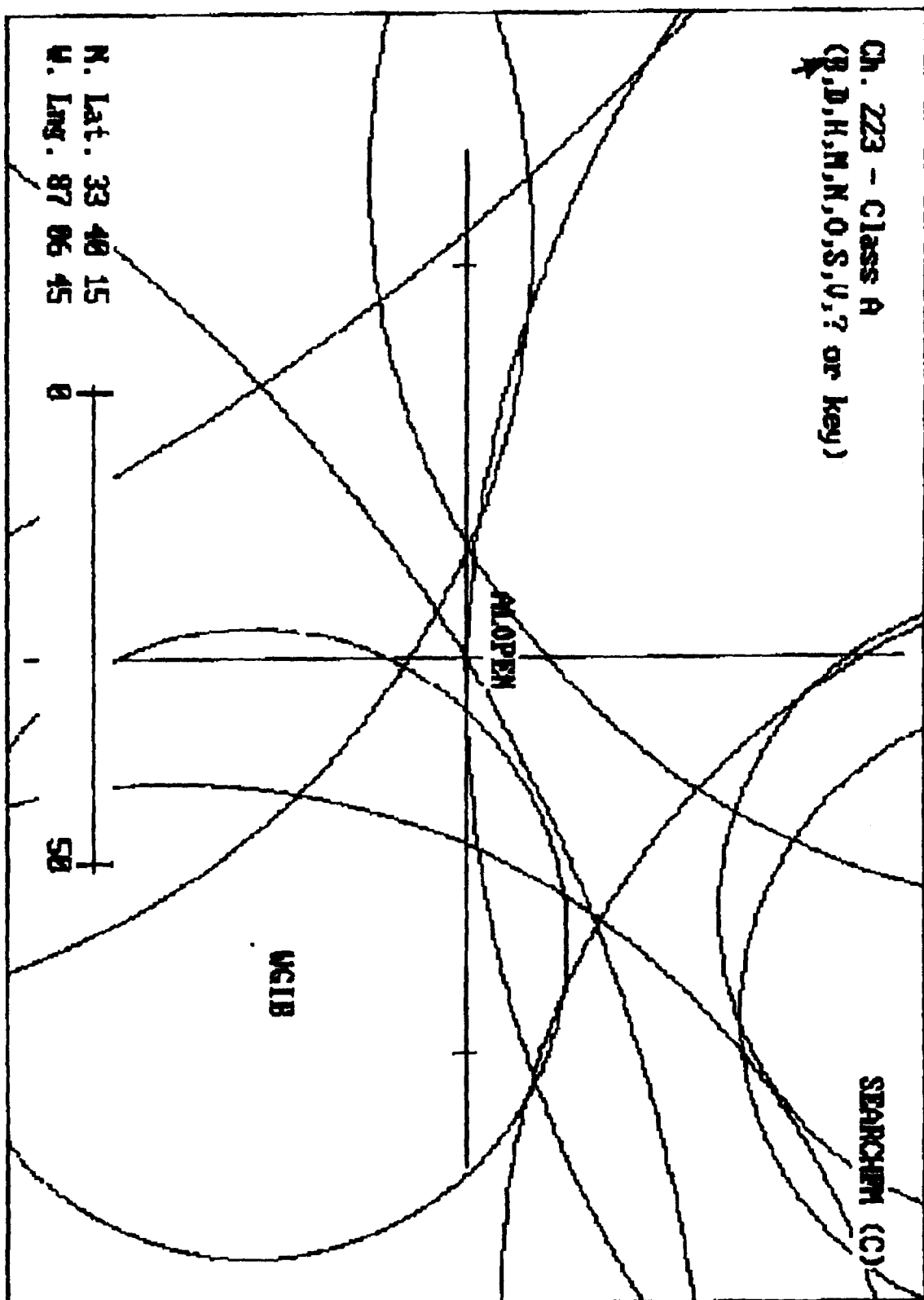
CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
ALOPEN	223A	Cordova	AL	0.0	0.00	115.0	-115.00 *
DE223	223A	Cordova	AL	0.0	0.00	115.0	-115.00 *
WAZK	223A	Trinity	AL	5.1	115.01	115.0	0.01 <
WJBBFM	224A	Haleyville	AL	327.0	73.53	72.0	1.53 <
WTUGFM	225C1	Tuscaloosa	AL	205.7	76.66	75.0	1.66 <
WLWIFM	222C	Montgomery	AL	146.6	169.18	165.0	4.18
WGIB	220A	Birmingham	AL	121.1	41.50	31.0	10.50
WEYYFM	224A	Talladega	AL	107.8	96.28	72.0	24.28
WQSTFM	223C	Forest	MS	235.1	254.42	226.0	28.42
WQSTFM	223C	Forest	MS	235.1	254.42	226.0	28.42
WCRQFM	224A	Arab	AL	42.9	102.03	72.0	30.03
WCRQFM	224A	Arab	AL	42.9	102.03	72.0	30.03
WCRQFM	224A	Arab	AL	43.0	102.04	72.0	30.04
WKUL	221A	Cullman	AL	30.4	64.14	31.0	33.14
WKUL.A	221A	Cullman	AL	36.6	71.52	31.0	40.52
WESE	223A	Baldwyn	MS	301.6	161.93	115.0	46.93
WESE.A	223A	Baldwyn	MS	301.6	161.93	115.0	46.93

PAUL REYNOLDS
480 GREENVILLE BYPASS - GREENVILLE AL 36037

LOCATION WINDOW - CH 223A
SITE @ MAXIMUM DISTANCE EAST

REFERENCE	CLASS A	DISPLAY DATES
33 40 15 N	Current rules spacings	DATA 06-27-94
87 06 45 W	CHANNEL 223 - 92.5 MHz	SEARCH 07-20-19

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
AOPEN	223A	Cordova	AL	275.4	7.45	115.0	-107.55 *
DE223	223A	Cordova	AL	275.4	7.45	115.0	-107.55 *
WLWIFM	222C	Montgomery	AL	148.7	164.59	165.0	-0.41 *
WAZK	223A	Trinity	AL	1.4	115.30	115.0	0.30 <
WGIB	220A	Birmingham	AL	126.4	34.93	31.0	3.93
WTUGFM	225C1	Tuscaloosa	AL	210.7	79.56	75.0	4.56
WJBBFM	224A	Haleyville	AL	322.8	78.37	72.0	6.37
WEYYFM	224A	Talladega	AL	108.8	89.01	72.0	17.01
WCRQFM	224A	Arab	AL	39.5	97.70	72.0	25.70
WCRQFM	224A	Arab	AL	39.5	97.70	72.0	25.70
WCRQFM	224A	Arab	AL	39.5	97.70	72.0	25.70
WKTH	221A	Cullman	AL	24.1	61.38	31.0	30.38
WQSTFM	223C	Forest	MS	236.1	260.20	226.0	34.20
WQSTFM	223C	Forest	MS	236.1	260.20	226.0	34.20
WKUL.A	221A	Cullman	AL	31.3	67.97	31.0	36.97



CERTIFICATE OF SERVICE

I, Elaine Fox, the Office Manager in the law firm of Mullin, Rhyne, Emmons and Topel, P.C., do hereby certify that a copy of the foregoing "COUNTERPROPOSAL" was mailed by first class U.S. Mail, postage prepaid, on this 22nd day of July, 1994, to the following:

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* Hand Delivered



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